

# **EXHIBIT 13**

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1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE EASTERN DISTRICT OF TEXAS  
3 SHERMAN DIVISION

4 THE STATE OF TEXAS, )  
5 et al., ) CASE NO.  
6 ) 4:20-cv-00957-SD  
7 Plaintiffs, )  
8 )  
9 vs. )  
10 )  
11 GOOGLE LLC, )  
12 )  
13 Defendant. )  
14 \_\_\_\_\_)

15 Taken at 100 Madison Street  
16 Missoula, Montana

17 Thursday, October 24, 2024 - 8:15 a.m.

18 \*\*\* CONFIDENTIAL \*\*\*

19 VIDEOTAPED DEPOSITION

20 OF

21 DR. JOHN CHANDLER, Ph.D.

22  
23 Reported by Emily K. Niles, RMR, CRC, CRR, NV CCR #782;

24  
25 Job No. CS6918917

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1 more broadly to say, no practical alternative, then I  
2 think there is not a practical alternative to GAM or to  
3 Google Ads depending on a company's business goals.

4 BY MR. ROSSON:

5 Q. What about AdX?

6 MR. RENARD: Objection to form.

7 THE WITNESS: There are alternative exchanges  
8 that advertisers can buy on for publishers. It is very  
9 hard to profitably run an online publishing business  
10 without entering into a business relationship with AdX.

11 BY MR. ROSSON:

12 Q. I'm going to talk about your Opinion 17 next.  
13 I'm looking at the opening report Paragraph 23,  
14 Subparagraph 17.

15 A. Okay.

16 Q. Do you know whether AdX runs a first-price  
17 auction?

18 A. In 2024, it is my understanding that AdX runs  
19 a first-price auction.

20 Q. Do you know when AdX went to a first-price  
21 auction?

22 A. I believe it was in 2019.

23 Q. Okay.

24 Do you have an understanding of whether  
25 Reserve Price Optimization was utilized after 2019?

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1 BY MR. ROSSON:

2 Q. Dr. Chandler, any testimony you want to  
3 correct or change?

4 A. No.

5 Q. Can a publisher choose to use AdX without  
6 using DFP?

7 A. Yes, it is possible for a publisher to use AdX  
8 without using Google Ad Manager.

9 Q. Can a publisher choose to use DFP without  
10 using AdX?

11 A. Yes.

12 MR. ROSSON: I pass the witness.

13 EXAMINATION

14 BY MR. RENARD:

15 Q. Dr. Chandler, I have a few questions and  
16 matters of clarification.

17 Do you recall the questions that Mr. Rosson  
18 asked you today regarding your opinions in your June 7  
19 opening report, which is Exhibit No. 1?

20 A. Yes.

21 Q. Was any of your testimony today, other than  
22 the errata matters that Mr. Rosson covered with you at  
23 the beginning, was any of your testimony today intended  
24 to change the opinions expressed in your opening report?

25 A. No.